

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN OF PENNSYLVANIA**

IN RE:	:	
ERIK D ROCKMORE	:	Case No. 22-12075-elf
Debtor	:	
	:	Chapter 13

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY FREEDOM MORTGAGE**

COMES NOW Erik D. Rockmore, hereinafter referred to as “Debtor,” by and through his undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Freedom Mortgage Corporation, “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part as some payments were missed.
5. Admitted.
6. Admitted.
7. Denied.
8. Admitted.
9. Admitted.
10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: February 15, 2023

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for the Debtor

Sadek & Cooper

1500 JFK Blvd., Suite #220

Philadelphia, PA 19102

(215) 545-0008